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October 28, 2022

Re: *Nexstar Media Inc. v. Comcast Cable Communications, LLC*, No. 1:21-cv-06860-JGK-SDA

VIA ECF

The Honorable John G. Koeltl
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Dear Judge Koeltl:

We represent Defendant, Counterclaim Plaintiff, and Third-Party Plaintiff Comcast Cable Communications, LLC ("Comcast") in the above-referenced action. Pursuant to Rule VI.A.2. of Your Honor's Individual Practices and Paragraph III.4.b. of the Stipulated Protective Order (Dkt. No. 135) entered in this action, we write to request permission to file under temporary seal an unredacted version of Comcast's memorandum of law in opposition to the objections (Dkt. No. 158) of Plaintiff and Counterclaim Defendant Nexstar Media Inc. ("Nexstar") to Magistrate Judge Aaron's October 6, 2022 order granting Comcast's motion to compel discovery (Dkt. Nos. 154, 155), ("Opposition"), which we submit contemporaneously herewith.

Comcast's Opposition refers to or reflects certain information that has previously been sealed in this case, such as specific provisions of the relevant contracts and the parties' pre-litigation correspondence. Comcast itself does not currently seek permanent confidential treatment of such information. But Comcast requests that the Opposition be filed under temporary seal (and with certain redactions made to the publicly filed version consistent with previous sealing requests) to afford Nexstar and Third-Party Defendant Mission Broadcasting, Inc. ("Mission") the opportunity to file any application(s) for permanent sealing and/or redaction should they choose to do so. Prior to the filing of this letter, Comcast informed counsel for Nexstar and Mission of its submission of this letter-request, and, pursuant to Rule VI.A.2., notified the same of their obligation to file any letter(s) requesting permanent sealing and/or redaction within three days.

As required by Rule VI.A.2., Comcast submits herewith: (i) an unredacted copy of the Opposition, which, if Comcast's application were granted, would be placed under temporary seal; and (ii) a proposed public version of the Opposition.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Dana M. Seshens

Dana M. Seshens

cc: All counsel of record (via ECF)

APPLICATION GRANTED
SO ORDERED

10/29/22 
John G. Koeltl, U.S.D.J.